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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 RENEE HALE-DRASE,
 12 Plaintiff,
 13 v.
 14 BARCLAYS BANK DELAWARE, *et al.*,
 15 Defendants.

16 Case No.: 2:24-cv-01801-JCM-NJK

17 **DEFENDANT BARCLAYS BANK
 18 DELAWARE'S UNOPPOSED MOTION
 19 FOR FURTHER EXTENSION OF TIME
 20 TO RESPOND TO PLAINTIFF'S
 21 COMPLAINT
 22 (SECOND REQUEST)**

23 Defendant Barclays Bank Delaware ("Barclays"), by and through its undersigned counsel
 24 and with the consent of the Plaintiff Renee Hale-Drase, respectfully requests a fourteen (14) day
 25 extension of time for Barclays to respond to Plaintiff's Complaint (ECF No. 1). In support of this
 26 Motion, Barclays states as follows:

- 27
- 28 1. Plaintiff filed her Complaint on or about September 25, 2024. (*See* ECF No. 1).
 - 29 2. Barclays' registered agent received a copy of the Complaint on or about September
 30 26, 2024.
 - 31 3. On October 17, 2024, Barclays timely filed an unopposed motion (ECF No. 6) to
 32 extend its deadline for responding to the Complaint until November 7, 2024. The Court granted
 33 that motion by order dated October 18, 2024 (*see* ECF No. 8).
 - 34 4. Barclays' deadline for responding to the Complaint has not yet expired.

5. Prior to submitting this Motion, counsel for Barclays conferred with counsel for Plaintiff, who agreed to a further fourteen (14) day extension of time from November 7 for Barclays to file a response to Plaintiff's Complaint. As such, Barclays is requesting that its deadline to respond to the Complaint be extended until November 21, 2024.

6. This extension of time is necessary as Barclays is investigating the facts alleged in the Complaint and requires this extension of time to complete such investigation and prepare an adequate response to the Complaint.

7. Pursuant to Fed. R. Civ. P. 6(b), Barclays respectfully submits that good cause is shown for the requested extension of time to respond to the Complaint.

8. This is Barclays' second extension request and is not sought for the purpose of delay. No party will be prejudiced by the relief sought in this motion.

WHEREFORE, Defendant Barclays Bank Delaware respectfully requests that this Honorable Court grant it a further extension of time to respond to Plaintiff's Complaint through and including November 21, 2024, and for such other and further relief that this Court deems necessary and appropriate.

DATED this 7th day of November, 2024.

Respectfully submitted,

LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ Brittni A. Tanenbaum

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ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATE: November 8, 2024